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April 13, 1998

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

Harold R. Moore III  
Environmental Claim Supervisor  
Wausau Insurance Companies - Midwestern Division  
1431 Opus Place  
Suite 300  
Downers Grove, IL 60515-1169

**Re: Potential Claim for Environmental Damage in the  
Couer d'Alene Basin, Northern Idaho  
Insured: Group R. Co., Inc.  
Your File No.: H74-102666**

Dear Mr. Moore:

Thank you for your letter of January 19, 1998, in which you acknowledge Group R Co., Inc.'s tender of the above-referenced matter. Our responses to your requests for information contained in your letter follow:

**REQUEST NO. 1:** Please provide a brief history of the facility and its dates of operation including a description of product manufactured, materials processed or service provided, and information on previous owners.

**RESPONSE:** See Group R Co., Inc.'s response to the USEPA's 104(e) Request for Information ("Group R's 104(e) Response") enclosed herewith. If you would like copies of the documents that Group R submitted with its 104(e) response, please advise.

**REQUEST NO. 2:** Provide a description of past and present waste disposal operations or the process operations suspected of causing the alleged pollution. This should include:

- a. Inventory of chemicals used.
- b. Volumes and methods of waste disposed both on-site and off-site.

**USEPA SF**  
  
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Roseland New Jersey  
07068-1791



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c. The size and type of chemical waste storage containers or impoundments.

RESPONSE: See Group R's 104(e) Response enclosed herewith.

REQUEST NO. 3: Provide a history of any leaks, spills or other releases at the site or facility and the clean-up operations or remediations conducted in response to those incidents.

RESPONSE: See Group R's 104(e) Response enclosed herewith.

REQUEST NO. 4: Please give details including dates of all sudden and accidental discharges, dispersals, releases or escapes of pollutants from the site.

RESPONSE: See Group R's 104(e) Response enclosed herewith.

REQUEST NO. 5: State in detail how the contamination took place.

RESPONSE: See Group R's 104(e) Response enclosed herewith.

REQUEST NO. 6: Provide information on potential other sources of contamination both on-site and off-site.

RESPONSE: See Group R's 104(e) Response enclosed herewith.

REQUEST NO. 7: Provide any summary reports or results of any comprehensive environmental studies conducted to date which outline the extent and degree of the alleged contaminated soil, air, surface and ground water.

RESPONSE: Currently, Group R does not have any documents responsive to this request.

REQUEST NO. 8: Please provide a description of the use of the surrounding land both contiguous to and within a two mile radius of the facility; e.g., residential, industrial, farmland, wooded, etc.

RESPONSE: See Group R's 104(e) Response enclosed herewith.

REQUEST NO. 9: Identify all primary and umbrella carriers and their policy periods from the time the your company first operated at this site to the present.

RESPONSE: This matter is still in its preliminary stages. We currently are in the process of determining our client's full insurance profile. Accordingly, we cannot provide you with this information at this time. We note, however, that this information should not be necessary for



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you to make a coverage determination with respect to the applicable policies referenced in your letter and we expect that our inability to provide this information at this time will in no way delay your coverage determination.

We will continue to keep you updated with respect to the progress of this matter and we look forward to receiving a timely coverage determination.

If you have any questions, or require additional information, please do not hesitate to contact me or Michael David Lichtenstein of this office.

Very truly yours,

  
David M. Wissert

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Enclosure

cc: Michael David Lichtenstein, Esq. (w/o encl.)



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